Case 4:24-mc-00248

Document 3-3

Filed on 03/05/24 in

Exhibit

1 of 2

OMB No. 1545-0150

For IRS Use Only

Received by:

Form

(Rev. January 2021) Department of the Treasury Internal Revenue Service

and Declaration of Representative ▶ Go to www.irs.gov/Form2848 for instructions and the latest information.

Power of Attorney

Name A. James

Part I **Power of Attorney**

Caution: A separate Form 2848 must be completed for each taxpayer. Form 2848 will not be honored

Telephone Function SS SE

		ourpose other than represe] [Date U / § /
1		mation. Taxpayer must sign	and date th	is form on	page 2, lir		- N - N	1 1 1 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
	yer name and ad	dress				Taxpayer identificati	on number(s)	
ABT	C Corp.	O.: ita 205							
Hou	ston, Texas 7	reeway, Suite 325 7424				Daytime telephone r	number	Plan num	ber (if applicable)
hereby	appoints the fol	lowing representative(s) as a	attorney(s)-in-	-fact:		American management			- <u>1988 - 1984 - 1984 - 1984 - 1984 - 1984 - 1984 - 1984 - 1984 - 1984 - 1984 - 1984 - 1984 - 1984 - 1984 - 19</u>
2	Representative	e(s) must sign and date this	form on page	e 2, Part II					
	and address_		- 12.7	9 H		CAF No.	1		
Christopher Ray esq.				PTIN					
100 State Street 9th Floor Boston MA 02109					Telephone No.				
						Fax No.			
Check	if to be sent co	pies of notices and comm	unications	\square	Check	if new: Address	Telephon	e No. 🗌	Fax No.
Name	and address			• •		CAF No.			
						PTIN			
					100 200 1	Telephone No.			
		RECEIVED				Fax No.			
		RECEIVED pies of notices and commi	unications		Check	if new: Address 🗌	Telephon	e No. 🗌	Fax No.
Name	and address	SB/SE COMPLIANCE F	ELD			CAF No.	1		
					9 , 9	PTIN			
		NOV 0 8 2021				Telephone No.			
		VILL			1 12 31 12	Fax No.			
		s and communications to on		entatives.)	Check	if new: Address 🗌	Telephon	e No. 🗌	Fax No.
Name	and address	SOUTHEAST TERRITO			2 10 12	CAF No.			
		MONROE, LA 7120	1						
						Telephone No.			
					100	Fax No.			
(Note:	IRS sends notice	s and communications to on	ly two repres	entatives.)	Check	if new: Address 🔲	Telephone	e No. 🗌	Fax No.
		er before the Internal Revenu						* ***	
3	Acts authorize	d (you are required to com	plete line 3).	Except fo	r the acts	described in line 5b, I	authorize m	y representa	ative(s) to receive a
	inspect my con	fidential tax information and	to perform	acts I can	perform v	with respect to the tax	matters de	escribed belo	ow. For example, r
	representative(s	shall have the authority to	sign any agr	reements,	consents,	or similar documents	(see instruc	tions for line	5a for authorizing
Descr	iption of Matter (Income, Employment, Payro itioner Discipline, PLR, FOIA	II, Excise, Est	tate, Gift,		Tax Form Number	Y	ear(s) or Per	iod(s) (if applicable)
	1980H Shared Re	esponsibility Payment, etc.) (see instruction	y, Sec.	(1040, 9	941, 720, etc.) (if appli	cable)		nstructions)
Title 3				J113)					,
THE 3	I DOA			120 000		NA			2020
		10 A 1 A 1	1 1 1				2 . 1	4 7 1 1 1 4	
				,					
							*		
4	Specific use no	ot recorded on the Central	lized Author	ization Ei	In (CAE)	£ 41			
	CAF, check this	box. See Line 4. Specific U	se Not Reco	rded on C	AE in the in	the power of attorn	ey is for a s	pecific use	
5a	CAF, check this box. See <i>Line 4. Specific Use Not Recorded on CAF</i> in the instructions								
	instructions for I	ine 5a for more information):	Access	my IRS re	above, i au	ithorize my representa	ative(s) to pe	erform the fo	llowing acts (see
	Authorize dis	closure to third parties;	Substitu	ite or add	represent				
	☐ Authorize disclosure to third parties; ☐ Substitute or add representative(s); ☐ Sign a return;							-	
					8	Ŷ			
	8								
	Other acts au	thorized:							
							3		

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Form 2848 (Rev. 1-2021) Specific acts not authorized. My representative(s) is (are) not authorized to endorse or otherwise negotiate any check (including directing or accepting payment by any means, electronic or otherwise, into an account owned or controlled by the representative(s) or any firm or other entity with whom the representative(s) is (are) associated) issued by the government in respect of a federal tax liability. List any other specific deletions to the acts otherwise authorized in this power of attorney (see instructions for line 5b): Retention/revocation of prior power(s) of attorney. The filing of this power of attorney automatically revokes all earlier power(s) of attorney on file with the Internal Revenue Service for the same matters and years or periods covered by this form. If you do not want to YOU MUST ATTACH A COPY OF ANY POWER OF ATTORNEY YOU WANT TO REMAIN IN EFFECT. Taxpayer declaration and signature. If a tax matter concerns a year in which a joint return was filed, each spouse must file a separate power of attorney even if they are appointing the same representative(s). If signed by a corporate officer, partner, guardian, tax matters partner, partnership representative (or designated individual, if applicable), executor, receiver, administrator, trustee, or individual other than the taxpayer, I certify I have the legal authority to execute this form on behalf of the taxpayer. ▶ IF NOT COMPLETED, SIGNED, AND DATED, THE IRS WILL RETURN THIS POWER OF ATTORNEY TO THE TAXPAYER. 11-8-2021 Date Title (if applicable) Marcus Andrade on behalf of ABTC Corp. Print name Print name of taxpayer from line 1 if other than individual **Declaration of Representative** Part II Under penalties of perjury, by my signature below I declare that: • I am not currently suspended or disbarred from practice, or ineligible for practice, before the Internal Revenue Service; • I am subject to regulations in Circular 230 (31 CFR, Subtitle A, Part 10), as amended, governing practice before the Internal Revenue Service; • I am authorized to represent the taxpayer identified in Part I for the matter(s) specified there; and • I am one of the following: a Attorney—a member in good standing of the bar of the highest court of the jurisdiction shown below. b Certified Public Accountant – a holder of an active license to practice as a certified public accountant in the jurisdiction shown below. c Enrolled Agent-enrolled as an agent by the IRS per the requirements of Circular 230. d Officer-a bona fide officer of the taxpayer organization.

- e Full-Time Employee a full-time employee of the taxpayer.
- f Family Member—a member of the taxpayer's immediate family (spouse, parent, child, grandparent, grandchild, step-parent, step-child, brother, or sister).
- g Enrolled Actuary—enrolled as an actuary by the Joint Board for the Enrollment of Actuaries under 29 U.S.C. 1242 (the authority to practice before the IRS is limited by section 10.3(d) of Circular 230).
- h Unenrolled Return Preparer—Authority to practice before the IRS is limited. An unenrolled return preparer may represent, provided the preparer (1) prepared and signed the return or claim for refund (or prepared if there is no signature space on the form); (2) was eligible to sign the return or claim for refund; (3) has a valid PTIN; and (4) possesses the required Annual Filing Season Program Record of Completion(s). See Special Rules and Requirements for Unenrolled Return Preparers in the instructions for additional information.
- k Qualifying Student or Law Graduate—receives permission to represent taxpayers before the IRS by virtue of his/her status as a law, business, or accounting student, or law graduate working in a LITC or STCP. See instructions for Part II for additional information and requirements.
- r Enrolled Retirement Plan Agent—enrolled as a retirement plan agent under the requirements of Circular 230 (the authority to practice before the Internal Revenue Service is limited by section 10.3(e)).

▶ IF THIS DECLARATION OF REPRESENTATIVE IS NOT COMPLETED, SIGNED, AND DATED, THE IRS WILL RETURN THE POWER OF ATTORNEY. REPRESENTATIVES MUST SIGN IN THE ORDER LISTED IN PART I, LINE 2.

Note: For designations d-f, enter your title, position, or relationship to the taxpayer in the "Licensing jurisdiction" column.

Designation— Insert above letter (a-r).	Licensing jurisdiction (State) or other licensing authority (if applicable)		Signature	Date
а	MA	692261		10/28/2021
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